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2010 JUN 18 PM 4:50

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY *CP* **ORIGINAL**
ORIGINAL

1 Jerroll B. R. Dolphin
2 P.O. Box 641009
3 Los Angeles, CA 90064
4 310-384-4483
5 St. Luke School of Medicine, et al in Pro Per
6
7

8 **United States District Court**
9 **Central District of California**

10 St. Luke School of Medicine, et al,) Case No.: CV 10-01791-RGK (SHx)
11 Plaintiff,)
12 vs.) **REQUEST FOR:**
13 The Republic of Liberia, et al,) **Court Leniency and Extension of**
14 Defendant(s).) **Time**
15

16
17 **DECLARATION**
18

19 I am Dr. Jerroll B. R. Dolphin, plaintiff in St. Luke School of Medicine, et al vs.
20 the Republic of Liberia, et al.
21

22 Since June 11, 2010 I have not had any contact with Attorney Thaddeus J. Culpepper
23 with the exception of two e-mails, exhibit 1 and exhibit 2.
24

25 Since June 1, 2010, he has not updated me on the status of any motion by any of the
26 defendants in this case. I have sent him about 10 e-mails to which he has responded
27 to two (exhibits 1 and 2).
28

1 I believe that Mr. Culpepper's replies should be reviewed for completeness and
2 effectiveness (to argue against our opponent's causes) before submission to this court
3 as a courtesy and a meeting of the minds. He did not give me or my associates the
4 opportunity to review the reply to ECFMG-FAIMER's motion before he submitted it to
5 this court.

6
7 I was upset when I read the reply that he submitted to this court. He erroneously
8 stated in his reply that it was Liberia's conduct (alone) that Liberia's conduct, as
9 alleged in the First Amended Complaint, stripped SLSOM of its ability to function as a
10 medical school both legally and financially. In fact it was the conduct of Liberia,
11 ECFMG and FAIMER together that stripped SLSOM of its ability to function as a medical
12 school both legally and financially.

13
14 I was disappointed that he did not oppose ECFMG-FAIMER's claim to the three statute of
15 limitations laws referenced in their Motion.

16
17 I have asked Mr. Culpepper to resign as my attorney in this case on June 17, 2010
18 because I believe his lack of communication with me, as his client, does not enable us
19 to effectively make decisions that impact this case. Also I do not feel that
20 memorandums and replies to motions should be delayed or tardy.

21
22 Mr. Culpepper did finally talk to me today around 12:00 PM. He said he would sign the
23 Request for Substitution of Attorney that I will send to him.

24 //

25 //

26 //

27 //

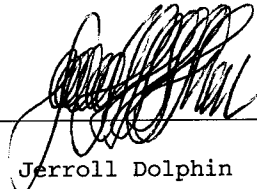
28 //

1 I am asking this court for leniency to allow me more time, 45 days, to seek another
2 attorney and file the plaintiff's memorandum and reply to the Motions by ECFMG-FAIMER,
3 the University of Illinois, and the State of Oregon as required by the applicable FRCP
4 and local rules of this court.

5
6 I declare under penalty of perjury that the foregoing is true and correct.

7
8 Dated: June 18, 2010

9
10 Signature: _____

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Jerroll Dolphin
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Jerroll Dolphin

From: "Jerroll Dolphin" <jdolphin@stluke.edu>
To: <thaddeusfsc@gmail.com>; "Culpepper" <culpepper@alumni.pitt.edu>; "Thaddeus J. Culpepper" <tjculpepper@yahoo.com>
Cc: "Larry Walls" <larrywalls@sbcglobal.net>; "Emmett J Morgan" <ejmorganjr@yahoo.com>; "JDyahoo" <jerrollbrdolphin@yahoo.com>
Sent: Thursday, June 17, 2010 1:12 AM
Subject: Re: Vacation
 Dear Thaddeus,

Thank you for your response to our concern. We all would be very pleased if you would provide how this surreply will be submitted to the court before the hearing on June 21st. We are all very concerned because success against ECFMG-FAIMER motion to dismiss is a cornerstone of our strategy, and it would put added pressure on the other defendants.

So, I welcome your call today. I will certainly listen intently to learn how you intend to file the surreply. Then I can discuss your strategy to other Board members. I am sure that they all will also be relieved.

Thank you once again.

-- Dr. Dolphin

Jerroll B. R. Dolphin, MD
 President
 St. Luke School of Medicine
 +1-310-384-4483

This email is confidential and privileged and property of the St. Luke School of Medicine (SLSOM). All electronic communications originating or intended for St. Luke School of Medicine are covered by the Electronic Communications Privacy Act 18 U.S.C. 2510-2521 and are protected from disclosure under the Gramm-Leach-Bliley Act. Use or disclosure of any privileged information by anyone other than the intended recipient, without executed disclosure permission from SLSOM is expressly forbidden. If you are not the intended recipient, please delete this e-mail and all of its attachments.

----- Original Message -----

From: Thaddeus
To: Jerroll Dolphin
Sent: Wednesday, June 16, 2010 6:43 PM
Subject: Re: Vacation

Exhibit 2

No worries. There is no such thing as an amendment to an opposition. But we can talk about it in what's called a surreply, our answer to ECFMG's reply.

Thaddeus J. Culpepper

--- On Wed, 6/16/10, Jerroll Dolphin <jdolphin@stluke.edu> wrote:

From: Jerroll Dolphin <jdolphin@stluke.edu>
 Subject: Re: Vacation

6/18/2010

Jerroll Dolphin

From: "Jerroll Dolphin" <jdolphin@stluke.edu>
To: "Tjculpepper" <tjculpepper@yahoo.com>
Cc: "Thaddeus J. Culpepper" <tjculpepper@yahoo.com>; "Culpepper" <culpepper@alumni.pitt.edu>;
"Larry Walls" <larrywalls@sbcglobal.net>
Sent: Wednesday, June 16, 2010 11:38 AM
Attach: SLSOM Amended Opposition.pdf; SLSOM Amended Opposition.doc
Subject: Re: Vacation
Dear Thaddeus,

Larry Walls and I have prepared an amendment to the opposition that you filed. Surely, I am aware that it does not have the smoothness of your writing. However, I will file it in your name unless you want to e-file it today.

Please RSVP ASAP. I will leave for the Federal Building at 12:30 PM today.

-- Dr. Dolphin

Exhibit 1

----- Original Message -----

From: Tjculpepper
To: Jerroll Dolphin
Sent: Wednesday, June 16, 2010 7:35 AM
Subject: Vacation

On vacation. Call you tomorrow. No phone. Taking a much needed break.

6/18/2010

1 **PROOF OF SERVICE**

2

3 I, Jervoll Dolphin (name), declare as follows. I am over the

4 age of 18 years. My address is:

5 _____

6 _____

7 _____

8 On June 18, 2010 (date), I served the foregoing document described

9 as:

10 Request for: Court Leniency & Extension of Time

11 _____

12 _____

13 _____

14

15 on all interested parties in this action by placing a true and correct copy thereof in a

16 sealed envelope, with first-class postage prepaid thereon, and deposited said

17 envelope in the United States mail in Los Angeles, CA (city, state), addressed

18 to:

19 MICHAEL D. YOUNG & NICOLE RIVAS (name)

20 ALSTON & BIRD, LLP (name)

21 333 S. Hope St., 16th Floor (address)

22 Los Angeles, CA 90071 (address)

23 JAMES L. ROGERS (name)

24 125 S. Highway 101, Suite 101 (address)

25 Solana Beach, CA 92075 (address)

26 I declare under penalty of perjury under the laws of the states of the United States

27 that the foregoing is true and correct.

28 Executed on June 18, 2010 (date) at Los Angeles, CA (place of signing).

Jervoll Dolphin (signature)

Jervoll Dolphin (name)